

IN THE U.S. DISTRICT COURT FOR THE DISTRICT OF NEW HAMPSHIRE

Jane Doe,

Plaintiff,

v.

St. Paul's School,

Defendant.

Case No.

**[PROPOSED] PROTECTIVE ORDER GRANTING PLAINTIFF'S MOTION
SEEKING A PROTECTIVE ORDER SEALING
PORTIONS OF THE COURT RECORD**

Whereas, Plaintiff, Jane Doe, has filed a Motion Seeking a Protective Order Sealing Portions of the Court Record (the "Motion");

Whereas, in the Motion, Plaintiff has "explained the basis for sealing" in accordance with L.R. 83.12(c);

Whereas, in the Motion, Plaintiff has "specified the proposed date on which the requested seal order shall expire" in accordance with L.R. 83.12(c);

Whereas, in the Motion, Plaintiff has "designated whether the material is to be sealed at Level I or Level II" in accordance with L.R. 83.12(c);

Whereas, Plaintiff has identified the following portion of the record as that portion which is subject to the Motion: Exhibit A to Plaintiff's Motion for Leave to Proceed Under Pseudonym and Memorandum in Support thereof (the "Sealed Record");

Whereas, the Court has considered the Motion and any opposition thereto;

Whereas, the Court has not ruled on the Motion for at least fourteen (14) days after it was entered on the public Court docket to permit the filing of objections by interested parties;

Whereas, the Court has considered any objections by interested parties;

Whereas, the Plaintiff has stated in the Motion why alternatives to sealing would not provide sufficient protection;

Whereas, the Court finds and holds that sealing a portion or portions of the record, specified herein, is appropriate;

Accordingly, on this ____ day of _____, by the United States District Court for the District of New Hampshire, it is hereby ORDERED:

1. That Plaintiff's Motion Seeking a Protective Order Sealing Portions of the Court Record be, and the same hereby is, GRANTED, as specifically set forth herein;

2. That the Sealed Record (as defined above) be, and hereby is, PLACED UNDER SEAL by the Clerk of the Court and that the Sealed Record shall be placed in an envelope or other container which is marked SEALED SUBJECT TO ORDER OF COURT DATED _____.

3. A copy of this Order shall be mailed to all counsel of record and to any other person entitled to notice hereof, and shall be docketed in the Court file.

So Ordered.

United States District Judge
United States District Court for the
District of New Hampshire